

FOR THE DISTRICT OF NEW HAMPSHIRE

SCOTTSDALE CAPITAL ADVISORS CORP,)	
AND JOHN HURRY,)	
)	
Plaintiffs,)	
)	CASE NO. 1:16-CV-00545
v.)	
)	Hon. Joseph Normand Laplante
THE DEAL, LLC AND WILLIAM MEAGHER,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(2), defendants The Deal LLC and William Meagher (collectively, the “Defendants”), move to dismiss the complaint (the “Complaint”) filed in the above-referenced action by plaintiffs Scottsdale Capital Advisors Corp. and John Hurry (collectively, the “Plaintiffs”) for lack of personal jurisdiction.

The Complaint contains no allegations that connect any of Plaintiffs’ New Hampshire tort claims with New Hampshire. Since there are no specific and concrete allegations of contacts between this lawsuit and New Hampshire, constitutional principles of Due Process preclude the exercise of personal jurisdiction over Defendants in this case.

In support of their Motion to Dismiss, Defendants submit the annexed Memorandum of Law, the Declaration of Eric Lundberg, the Declaration of William Meagher, with exhibits, and the Declaration of John M. Browning, counsel for Defendants, with exhibits.

Wherefore, Defendants pray the Court to dismiss the Complaint in its entirety.

DATED: February 2, 2017

Respectfully submitted,
The Deal, LLC and William Meagher
By Their Attorneys:
SHAHEEN & GORDON, P.A.

/s/ Steven M. Gordon

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Dismiss was served on the following persons on this date and in the manner specified herein:

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Dated: February 2, 2017

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